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January 31, 2006

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## VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Office of Managing Director  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-B204  
Washington, DC 20554

**Re: Bluegrass Wireless LLC, Kentucky RSA #3 Cellular General Partnership,  
Kentucky RSA #4 Cellular General Partnership, and Cumberland Cellular  
Partnership  
CC Docket No. 96-45, DA 05-3032**

Dear Madam Secretary:

On behalf of Bluegrass Wireless LLC, Kentucky RSA #3 Cellular General Partnership, Kentucky RSA #4 Cellular General Partnership, and Cumberland Cellular Partnership (collectively, "Bluegrass Cellular") we enclose a copy of the recent order ("Clarification Order") by the Kentucky Public Service Commission ("KPSC") clarifying the redefinition analysis in its previous order designating Bluegrass Cellular as an ETC ("Designation Order"). On November 10, 2005, Bluegrass Cellular petitioned the FCC for concurrence with the KPSC's proposal to redefine the service areas of ALLTEL Kentucky, Inc. and Kentucky ALLTEL, Inc. - London, pursuant to the process set forth in Section 54.207(c) of the Commission's rules.<sup>1</sup>

We note that Bluegrass Cellular's Petition, which was uncontested, sets forth the complete analysis required under the FCC's rules and orders, including a discussion of the recommendations of the Federal-State Joint Board on Universal Service. Bluegrass Cellular

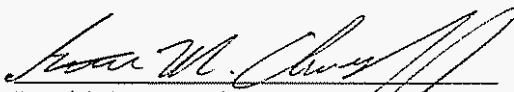
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<sup>1</sup> Petition of Bluegrass Wireless LLC, Kentucky RSA #3 Cellular General Partnership, Kentucky RSA #4 Cellular General Partnership, and Cumberland Cellular Partnership for Agreement with Redefining the Service Areas of Rural Telephone Companies in the Commonwealth of Kentucky Pursuant to 47 C.F.R. Section 207(c) (filed Nov. 10, 2005) ("Petition"). The Petition was announced and opened to public comment in a Public Notice released November 23, 2005. No comments or replies were filed.

obtained the Clarification Order to aid the FCC's analysis by providing the state commission's own detailed analysis. The analysis in the Clarification Order demonstrates that the analysis in Bluegrass Cellular's Petition is consistent with the KPSC's findings and conclusions. The Clarification Order does not affect the substance of Bluegrass Cellular's initial designation by the KPSC or the scope of the redefinition proposed in the Designation Order.

We trust you will find the above information to be useful. Should any question arise, please contact undersigned counsel.

Sincerely,

  
\_\_\_\_\_  
David A. LaFuria  
Steven M. Chernoff

Encl.

cc: Mark Seifert, Esq., Wireline Competition Bureau  
Mika Savir, Esq., Wireline Competition Bureau  
Carol Pomponio, Esq., Wireline Competition Bureau  
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